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November 27, 2023

VIA ECF

Hon. Denise Cote
U.S. District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007

*The answer or responsive filing is
due 12/12/23. There shall be
no further extension.*
Denise Cote
11/28/23

Re: *Farrakhan, et al. v. Anti-Defamation League, et al.*, 1:23-cv-09110-DLC

Dear Judge Cote,

This firm represents Defendants Anti-Defamation League and Jonathan Greenblatt (the “ADL Defendants”) in the above referenced action. In the event that the Court decides to extend the deadline for Defendants Simon Wiesenthal Center (“SWC”) and Abraham Cooper (“Cooper”) to answer or otherwise respond to the Amended Complaint, the ADL Defendants respectfully request that the same extended deadline be set for the ADL Defendants. The ADL Defendants’ original response deadline was November 13, 2023, and this is the ADL Defendants’ second request for an extension.

This afternoon, Defendants SWC and Cooper requested that their response deadline be extended to December 18 because new counsel will be substituted. Earlier today, having learned that SWC and Cooper would be filing that request, the ADL Defendants sought the parties’ consent to have the ADL Defendants’ response deadline be extended to the same date as Defendants SWC and Cooper, so that there would be a common deadline for all defendants. Given the overlap and similarity in the defamation claims asserted in this lawsuit against all defendants, and in light of the decision by Defendants SWC and Cooper to substitute new counsel, the ADL Defendants believe that the interests of judicial economy would be best served by putting all defendants on the same schedule. Defendants SWC and Cooper consent to this request, but Plaintiffs do not. In their email refusing to consent, Plaintiffs’ counsel stated the following basis: “We are not concerned about different schedules for response deadlines.”

Accordingly, the ADL Defendants hereby request that if the Court extends the response deadline for the SWC and Cooper defendants, that the response deadline for the ADL Defendants be extended to the same date.

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Sincerely,

/s/ Nathan Siegel

Nathan Siegel